

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PATRICIA A. LATHAM,

Plaintiff,

vs.

THE MINNESOTA LIFE INSURANCE
COMPANY,

Defendant.

Case No.: 05-CV-10294-RWZ

FILED
CLERK'S OFFICE
2005 MAR 24 P 12:14
U.S. DISTRICT COURT
DISTRICT OF MASS.
RECEIPT # 62996
AMOUNT \$ 100.00
3/25/05

**MOTION FOR PRO HAC VICE ADMISSION OF
CATHERINE A.T. NELSON AND LEENA SONI**

NOW COMES John D. Shea of COZEN O'CONNOR, and pursuant to Local Rule 83.5.3(b) of the United States District Court for the District of Massachusetts, moves this Court for *pro hac vice* admission of Catherine A.T. Nelson and Leena Soni as counsel on behalf of Minnesota Life Insurance Company ("Minnesota Life") in this action, and in support thereof, states as follows that:

1. Movant John D. Shea of Cozen O'Connor is admitted to practice law in the State of Massachusetts, and his registration number is BBO 600652.
2. Catherine A. T. Nelson and Leena Soni of the law firm Cozen O'Connor desire to be admitted *pro hac vice* as counsel for Minnesota Life in this action, as set forth in their Affidavits attached hereto as Exhibits A and B, respectively.
3. Both Ms. Nelson and Ms. Soni have been retained by Minnesota Life to provide legal representation in this case pending before this Court.
4. Ms. Nelson and Ms. Soni are familiar with the law, facts and procedures relating to the subject matter of this litigation.
5. Ms. Nelson and Ms. Soni do not wish to be admitted generally, but for purpose of this case only.

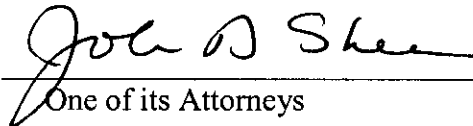
6. Ms. Nelson and Ms. Soni are familiar with and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts and further consent to the jurisdiction of the Court and any disciplinary boards of the State of Massachusetts.

WHEREFORE, Movant John D. Shea respectfully requests that Catherine A.T. Nelson and Leena Soni be admitted *pro hac vice* for this action only before the United States District Court for the District of Massachusetts.

DATED: March 22, 2005

Respectfully Submitted,

MINNESOTA LIFE INSURANCE COMPANY

By: 
One of its Attorneys

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Fax: (312) 382-8910
CNelson@Cozen.com
LSoni@Cozen.com

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing MOTION FOR *PRO HAC VICE* ADMISSION OF CATHERINE A.T. NELSON AND LEENA SONI was served via regular mail, postage pre-paid, on the 24th day of March 2005 on the following counsel of record:

Marc R. Deshaies
BBO#550198
388 County Street
New Bedford, MA 02740
508.996.8921



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AFFIDAVIT OF CATHERINE A.T. NELSON

NOW COMES Affiant, Catherine A.T. Nelson, being first duly sworn and of lawful age, and states to the Court as follows:

1. I was retained to represent the Minnesota Life Insurance Company ("Minnesota Life") in this matter.

2. I have represented Minnesota Life in various insurance matters for more than 12 years in the capacity of regional counsel. I have been involved in this matter since its commencement and am familiar with the facts and circumstances involved. Minnesota Life has specifically requested that I represent its interests in this matter.

3. My home address is 17540 Iroquois Trail, Tinley Park, Illinois 60477. I am a member of the firm of Cozen O'Connor, 222 South Riverside Plaza, Suite 1500, Chicago, Illinois 60606, (T) 312.382.3172, (F) 312.382.8910.

4. I am currently licensed to practice law in the State of Illinois. I was admitted to the Illinois Bar in 1986, and I am in good standing. My registration number in Illinois is 6192953.



5. I am also admitted to practice before the United States Supreme Court, the United States Court of Appeals for Sixth and Seventh Circuits and the United States District Court for the Northern District Court of Illinois.

6. I have never been suspended, disbarred or resigned as a result of a disciplinary charge or proceeding.

7. There is no disciplinary proceeding pending against me in any jurisdiction.

8. Good cause exists for my appearance in this matter due to my status as regional counsel for Minnesota Life and my longstanding attorney-client relationship with it.

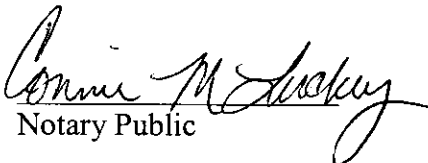
9. At this time, I respectfully seek the Court's permission for admission *pro hac vice* for purposes of this case only. I anticipate that the duration of my involvement in this case will be to and including the time of entry of final judgment.

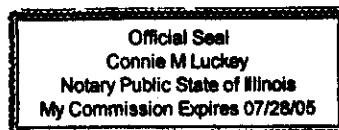
10. I affirm under the penalties for perjury, that the foregoing representations are true and correct, to the best of my knowledge, information and belief.

FURTHER AFFIANT SAYETH NAUGHT.


CATHERINE A.T. NELSON

Subscribed and sworn to
before me this 22nd day of
March, 2005.


Notary Public



#336830

IN THE UNITED STATES DISTRICT COURT
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Plaintiff,

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COMPANY,

Defendant.

Case No.: 05-CV-10294-RWZ

AFFIDAVIT OF LEENA SONI

NOW COMES Affiant, Leena Soni, being first duly sworn and of lawful age, and states to the Court as follows:

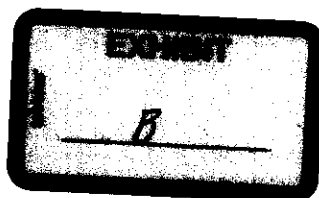
1. I was retained to represent the Minnesota Life Insurance Company ("Minnesota Life") in this matter.

2. I have represented Minnesota Life in various insurance matters for the last six years. I have been involved in this matter since its commencement and am familiar with the facts and circumstances involved. Minnesota Life has specifically requested that I represent its interests in this matter.

3. My home address is 2451 North Clybourn Avenue, Chicago, Illinois 60614. I am a member of the firm of Cozen O'Connor, 222 South Riverside Plaza, Suite 1500, Chicago, Illinois 60606, (T) 312.382.3172, (F) 312.382.8910.

4. I am currently licensed to practice law in the State of Illinois. I was admitted to the Illinois Bar in 1992, and I am in good standing. My registration number in Illinois is 6210129.

5. I am also admitted to practice before the United States Court of Appeals for Sixth and Seventh Circuits and the United States District Court for the Northern District of Illinois.



6. I have never been suspended, disbarred or resigned as a result of a disciplinary charge or proceeding.

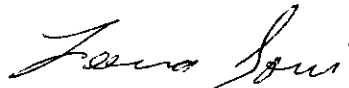
7. There is no disciplinary proceeding pending against me in any jurisdiction.

8. Good cause exists for my appearance in this matter due to my status as counsel for Minnesota Life and my longstanding attorney-client relationship with it.

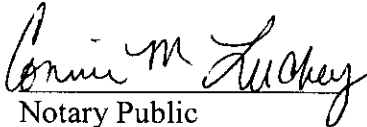
9. At this time, I respectfully seek the Court's permission for admission *pro hac vice* for purposes of this case only. I anticipate that the duration of my involvement in this case will be to and including the time of entry of final judgment.

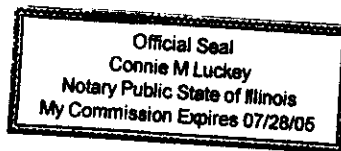
10. I affirm under the penalties for perjury, that the foregoing representations are true and correct, to the best of my knowledge, information and belief.

FURTHER AFFIANT SAYETH NAUGHT.


LEENA SONI

Subscribed and sworn to
before me this 22nd day of
March, 2005


Notary Public



#336831